

1 Neel Chatterjee (SBN 173985)
2 *nchatterjee@goodwinlaw.com*
3 James Lin (SBN 310440)
4 *jlin@goodwinlaw.com*
GOODWIN PROCTER LLP
5 135 Commonwealth Drive
Menlo Park, California 94025
Tel.: +1 650 752 3100
Fax.: +1 650 853 1038

6 Brett Schuman (SBN 189247)
bschuman@goodwinlaw.com
7 Shane Brun (SBN 179079)
sbrun@goodwinlaw.com
8 Rachel M. Walsh (SBN 250568)
rwalsh@goodwinlaw.com
9 Hayes P. Hyde (SBN 308031)
hhyde@goodwinlaw.com
GOODWIN PROCTER LLP
10 Three Embarcadero Center
11 San Francisco, California 94111
Tel.: +1 415 733 6000
12 Fax.: +1 415 677 9041

13 Hong-An Vu (SBN 266268)
hvu@goodwinlaw.com
14 Todd A. Boock (SBN 181933)
tboock@goodwinlaw.com
GOODWIN PROCTER LLP
15 601 S. Figueroa Street, 41st Floor
16 Los Angeles, California 90017
Tel.: +1 213 426 2500
17 Fax.: +1 213 623 1673

18 *Attorneys for Defendant:* Otto Trucking LLC

19 **UNITED STATES DISTRICT COURT**

20 **NORTHERN DISTRICT OF CALIFORNIA – SAN FRANCISCO DIVISION**

21 WAYMO LLC,

22 Plaintiff,

23 v.

24 UBER TECHNOLOGIES, INC.;
OTTOMOTTO LLC; OTTO TRUCKING
25 LLC,

26 Defendants.

Case No. 3:17-cv-00939-WHA

**AMENDED DECLARATION OF NEEL
CHATTERJEE ISO DEFENDANT OTTO
TRUCKING LLC'S ADMINISTRATIVE
MOTION TO FILE UNDER SEAL**

Courtroom: 8 (19th Floor)

Judge: Hon. William Alsup

Trial Date: December 4, 2017

Filed/Lodged Concurrently with:

1. Admin. Mot. to File Documents Under Seal
2. [Proposed] Order
3. Redacted/Unredacted Versions
4. Proof of Service

1 I, Neel Chatterjee, declare as follows:

2 1. I am a partner at the law firm of Goodwin Procter LLP, counsel of record for
 3 Defendant Otto Trucking LLC (“Otto Trucking”). I make this amended declaration based upon
 4 matters within my own personal knowledge and if called as a witness, I could and would
 5 competently testify to the matters set forth herein. I make this amended declaration in support of
 6 Defendant Otto Trucking’s Opposition to Waymo’s Second Supplemental Brief in Support of its
 7 Motion for Order to Show Cause [Dkt. 2054] (the “Administrative Motion”).

8 2. I have reviewed the following documents and confirmed that only the portions
 9 identified below merit provisional sealing:

Document	Portions to Be Filed Under Seal	Parties Claiming Confidentiality
Otto Trucking’s Opposition to Waymo’s Second Supplemental Brief in Support of its Motion for Order to Show Cause [Dkt. 2054]	Highlighted portions	Plaintiff
Exhibit A to the Walsh Declaration	Entire document	Plaintiff Defendants

16 3. The highlighted portions of Otto Trucking’s Motion and the entirety of Exhibit A
 17 allegedly contain information that Plaintiff Waymo LLC (“Waymo”) and Defendants Uber
 18 Technologies Inc. and Ottomotto LLC (collectively “Defendants”) have designated
 19 “Confidential” or “Highly Confidential – Attorneys’ Eyes Only” pursuant to the Protective Order
 20 in this case. Otto Trucking states no position as to whether the designations are appropriate.

21 4. Otto Trucking anticipates that Waymo and Defendants will file any necessary
 22 declarations to seal the above information pursuant to Local Rule 79-5.

23 5. Otto Trucking’s request to seal is narrowly tailored to those portions of the
 24 Administrative Motion and its supporting documents that merit provisional sealing based on
 25 Waymo’s and Defendants’ designations.

1 I declare under penalty of perjury under the laws of the United States that the foregoing is
2 true and correct. Executed this 30th day of October, 2017 in Menlo Park, California.

3 /s/ *Neel Chatterjee*
4 NEEL CHATTERJEE

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1 **CERTIFICATE OF SERVICE**

2 I hereby certify that I electronically filed the foregoing document including all of its
3 attachments with the Clerk of the Court for the United States District Court for the Northern
4 District of California by using the CM/ECF system on **October 30, 2017**. I further certify that
5 all participants in the case are registered CM/ECF users and that service of the publicly filed
6 documents will be accomplished by the CM/ECF system.

7 I certify under penalty of perjury that the foregoing is true and correct. Executed on
8 **October 30, 2017**.

9 /s/ *Neel Chatterjee*
10 NEEL CHATTERJEE

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